

## EXHIBIT 50

# Transcript of the Testimony of **Debra Aron**

**Date:** July 19, 2014

**Case:** Grant Birchmeier v. Caribbean Cruise Line, Inc.

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<p>1 A. Well, we discussed together. She's</p> <p>2 also quite experienced in telecommunications</p> <p>3 data issues. She's been working in the</p> <p>4 telecommunications area, as have I, for many</p> <p>5 years.</p> <p>6 And so we both have had quite a</p> <p>7 bit of experience working with similar kinds of</p> <p>8 data questions and analyzing telecommunications</p> <p>9 databases.</p> <p>10 So, we discussed the question of</p> <p>11 what specifically we want to know, we wanted to</p> <p>12 make sure that if a vendor said that they don't</p> <p>13 have relevant data, that we probed that; that</p> <p>14 we followed up to make sure that they may not</p> <p>15 have some partial data or some relevant data,</p> <p>16 that we would want to consider it if we were</p> <p>17 conducting the data exercise being proposed.</p> <p>18 Q. Does Ms. Danies have notes of who she</p> <p>19 talked to?</p> <p>20 A. She may. I don't know the answer to</p> <p>21 that, and I didn't inquire or see them.</p> <p>22 Q. Let's look at Footnote 4 on that same</p> <p>23 page.</p> <p>24 Do you see, for example, I</p>	<p>1 represents itself as having, as I indicate here</p> <p>2 in this footnote, the industry's largest</p> <p>3 available database of telephone numbers for</p> <p>4 forward and reverse phone append.</p> <p>5 And so it seemed like a</p> <p>6 worthwhile candidate to probe, to investigate.</p> <p>7 As I said in my report,</p> <p>8 throughout my experience in communications</p> <p>9 industry, and in dealing with the kinds of</p> <p>10 issues we were talking about today, I have not</p> <p>11 come across any vendor that purports to be able</p> <p>12 to provide historical, reliable data for</p> <p>13 reverse append services.</p> <p>14 Q. How did you come across Infutor?</p> <p>15 A. Identifying Infutor was the result of</p> <p>16 general research that we were conducting to</p> <p>17 identify vendors that represent themselves as</p> <p>18 being able to provide the kind of information</p> <p>19 we were looking for.</p> <p>20 Q. How did you do that research, just</p> <p>21 jump online and searched?</p> <p>22 A. The research would have included</p> <p>23 online research. It would also have included</p> <p>24 the knowledge that we've obtained in the course</p>
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<p>1 investigated the offerings from Infutor; do you</p> <p>2 see that?</p> <p>3 A. I do.</p> <p>4 Q. Did you personally investigate the</p> <p>5 offerings?</p> <p>6 A. I reviewed their online materials.</p> <p>7 Ms. Danies conducted the interview with them.</p> <p>8 Q. So, when it says, I was advised by a</p> <p>9 sales director, it should say Ms. Danies was</p> <p>10 advised?</p> <p>11 MR. BACKMAN: Form.</p> <p>12 THE WITNESS: Well, so let me say as</p> <p>13 I've said to you today, all of the specific</p> <p>14 interviews that I'm referring to in this report</p> <p>15 were conducted by her. And so I think it's</p> <p>16 fair to say that where I say I, I'm referring</p> <p>17 to my team.</p> <p>18 BY MR. RAUSCHER:</p> <p>19 Q. Do you know which sales director</p> <p>20 Ms. Danies spoke with?</p> <p>21 A. I can't give you a name, no.</p> <p>22 Q. Have you ever worked with -- I may be</p> <p>23 mispronouncing this -- with Infutor before?</p> <p>24 A. I have not. This is a company that</p>	<p>1 of my involvement in other TCPA cases.</p> <p>2 Q. Which companies -- let's stop there</p> <p>3 for a second.</p> <p>4 Which companies did you contact</p> <p>5 based on your knowledge of them from your other</p> <p>6 TCPA cases, just the names of the companies?</p> <p>7 A. Any companies that we contacted in the</p> <p>8 context of this research is in this report.</p> <p>9 Since filing my report --</p> <p>10 Q. Well, can you just try to answer</p> <p>11 the --</p> <p>12 MR. BACKMAN: I think she's trying to</p> <p>13 answer it. Let her finish.</p> <p>14 BY MR. RAUSCHER:</p> <p>15 Q. I just want names. I just want the</p> <p>16 names of companies you contacted based on your</p> <p>17 knowledge of those companies from other TCPA</p> <p>18 cases you've worked on.</p> <p>19 A. I can't say as I sit here which of</p> <p>20 these companies that I reported on.</p> <p>21 My knowledge of them was the</p> <p>22 direct result of other cases I've worked on.</p> <p>23 Q. Okay.</p> <p>24 A. What I'm saying is that I incorporated</p>

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<p>1 with respect to subpoena requests.</p> <p>2 The associate to which you're</p> <p>3 referring in that part of Paragraph 20 was the</p> <p>4 individual at Verizon's legal compliance center</p> <p>5 for its landline services that Verizon</p> <p>6 represents as being qualified to speak to</p> <p>7 Verizon's policies with respect to compliance</p> <p>8 for subpoenas.</p> <p>9 Q. What are you basing your opinion on</p> <p>10 that Verizon represents that person is</p> <p>11 qualified to speak to its subpoena compliance</p> <p>12 policies?</p> <p>13 A. The fact that this is the office to</p> <p>14 which Verizon directs people who are making</p> <p>15 inquiries about this very issue.</p> <p>16 Q. Which very issue?</p> <p>17 A. What is Verizon's policy with respect</p> <p>18 to responding to subpoenas for data.</p> <p>19 Q. You don't know specifically which</p> <p>20 associate your colleague talked to?</p> <p>21 A. I can't give you a name as I sit here,</p> <p>22 no.</p> <p>23 Q. And do you know if that's the same --</p> <p>24 the first sentence in this subparagraph refers</p>	<p>1 A. I think she's referring to the</p> <p>2 individual she spoke to as a representative of</p> <p>3 Verizon Wireless. So, they would be Verizon</p> <p>4 Wireless.</p> <p>5 Q. The next page is AT&amp;T?</p> <p>6 A. Yes.</p> <p>7 Q. Do you know who Ms. Danies spoke with</p> <p>8 at AT&amp;T?</p> <p>9 A. AT&amp;T has a single subpoena center that</p> <p>10 handles wireless and wireline data requests.</p> <p>11 And when I say single, I mean that the same</p> <p>12 National Compliance Center handles both</p> <p>13 wireless and wireline requests.</p> <p>14 What happens at AT&amp;T is that AT&amp;T</p> <p>15 has subpoena centers. She contacted the</p> <p>16 subpoena center and was told you have to talk</p> <p>17 to the National Compliance Center for a request</p> <p>18 of this magnitude.</p> <p>19 She then contacted the National</p> <p>20 Compliance Center and spoke to the</p> <p>21 representative there who answered our questions</p> <p>22 as represented in this paragraph.</p> <p>23 Q. Okay. Who are the people she spoke</p> <p>24 with at the National Compliance Center?</p>
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<p>1 to representatives at Verizon's legal</p> <p>2 compliance center; do you see that?</p> <p>3 A. I see that, yes.</p> <p>4 Q. Do you know if Ms. Danies had multiple</p> <p>5 conversations with people at Verizon?</p> <p>6 A. What I recall happened is that when</p> <p>7 she spoke to the legal compliance center, the</p> <p>8 initial representative referred her to a</p> <p>9 supervisor because the initial representative</p> <p>10 to whom she spoke didn't feel qualified to</p> <p>11 answer a question about the voluminous request</p> <p>12 we were asking about.</p> <p>13 Q. Do you know which staff Ms. Danies</p> <p>14 spoke to at Verizon Wireless, the next</p> <p>15 subparagraph?</p> <p>16 A. This would be the representative of</p> <p>17 Verizon Wireless at their subpoena and court</p> <p>18 order processing group.</p> <p>19 Q. Do you know how many people she spoke</p> <p>20 with?</p> <p>21 A. I believe at Verizon Wireless she</p> <p>22 spoke to one person.</p> <p>23 Q. So it says "they", do you know what</p> <p>24 the "they" refers to there?</p>	<p>1 A. I can't give you a name.</p> <p>2 Q. Okay. How many conversations did she</p> <p>3 have with them?</p> <p>4 A. Once she reached the National</p> <p>5 Compliance Center, I believe she had one</p> <p>6 conversation.</p> <p>7 Q. What about Sprint, who did she speak</p> <p>8 with at Sprint?</p> <p>9 A. She spoke to the individual identified</p> <p>10 here as Sprint's Corporate Security</p> <p>11 representative.</p> <p>12 Q. It says "representatives", do you know</p> <p>13 how many people she talked to?</p> <p>14 A. She spoke to one person that provided</p> <p>15 the information here. I believe she may have</p> <p>16 been referred to that person in light of the</p> <p>17 nature of the request.</p> <p>18 Q. Do you know how many people she</p> <p>19 said -- it says here, Sprint's Corporate</p> <p>20 Security representatives handling subpoena</p> <p>21 compliance and historic records requests stated</p> <p>22 that a voluminous request of around 900,000</p> <p>23 phone numbers would be quote, unquote</p> <p>24 burdensome, but that's Sprint has the ability</p>

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<p>1 to process that information, and it keeps 2 going. 3 So, it says representatives told 4 her that, is it just one person? 5 A. I believe it's one person. 6 Q. So, it's not accurate to say that 7 representatives told her that, correct? 8 MR. BACKMAN: Form. 9 THE WITNESS: I can't say it's not 10 accurate. My recollection is that the 11 information represented here was provided by 12 one person. 13 BY MR. RAUSCHER: 14 Q. So, why can you not say it's 15 inaccurate? 16 A. Because I would have to verify with 17 her that she didn't speak to more than one 18 person who gave the same information. 19 Q. Assuming that you're correct, that 20 your memory is correct that it was one person, 21 that's not an accurate sentence then, right? 22 MR. BACKMAN: Form. 23 THE WITNESS: I think that's fair. 24</p>	<p>1 What I've reported here is what 2 CenturyLink identifies on its website as its 3 policy for responding to subpoena requests for 4 data. 5 Q. Who is that outside vendor you were 6 talking about? 7 A. I believe they're called 8 CT Corporation. It's identified on their 9 website. 10 Q. And Ms. Danies called them? 11 A. She did. 12 Q. Do you know who she talked to at 13 CT Corporation? 14 A. No. 15 Q. Did anybody speak with anybody at 16 Comcast? 17 A. No. We attempted to reach Comcast. 18 At Comcast, they don't have a 19 person that answers the phone at their subpoena 20 compliance area. 21 And we left messages with Comcast 22 to which they did not respond. 23 So, we reported here what Comcast 24 reports on its website as its policy for</p>
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<p>1 BY MR. RAUSCHER: 2 Q. CenturyLink. It looks like nobody was 3 contacted there; is that correct? 4 A. It's not that nobody was contacted. 5 It's that no one responded to us. 6 Q. Okay. So, who did you try to contact 7 there? 8 A. At CenturyLink one is directed to an 9 outside vendor or provider that handles 10 subpoena requests for CenturyLink. 11 We spoke to them, and they said 12 that they only process subpoena requests, but 13 that to know what data CenturyLink would be 14 willing to provide or has or can provide or the 15 timeframe, we would have to speak to 16 CenturyLink directly. 17 They were not willing or able to 18 provide a phone number or person to whom we 19 could speak. We conducted our own search to 20 identify such a person. 21 But in the end, in the timeframe 22 we had, we were not able to identify someone at 23 CenturyLink who could or would speak to us 24 about this topic.</p>	<p>1 responding to requests for subscriber data. 2 Q. Have you ever been involved in the 3 notice process in a TCPA case? 4 A. Well, what do you mean by been 5 involved with? 6 Q. In helping designing a notice plan for 7 a TCPA case? 8 A. I have not participated in designing a 9 notice plan for a TCPA case, no. 10 Q. How many TCPA cases have you provided 11 expert opinions in? 12 A. Well, by expert opinion, do you mean 13 an expert report? 14 Q. Sure. We can start with that. 15 A. In addition to this one, one other. 16 Q. Which case was that? 17 A. That was Warnick v. Dish. 18 Q. Have you provided expert testimony 19 other than reports in other TCPA cases? 20 A. Well, in the Dish case, I gave a 21 deposition, and I testified in federal court. 22 Q. Have you been involved in TCPA cases 23 other than providing expert reports or 24 testimony?</p>